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5 Rainbow K Jewelry SAS

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION

11 Susan Oster d/b/a/ Feral Jewelry, an individual.

Plaintiff,

V.

14 Rainbow K Jewelry SAS, a French
15 joint-stock company; mytheresa.com
16 GmbH, a German entity; Schoola, Inc.
17 d/b/a Olivela.com, a Delaware
18 corporation; SoPicks, an Italian entity;
19 Eastward Bound Technology, Inc.
d/b/a Vugstyle, Inc., a Colorado
corporation; Last Resort, LLC, a
California company; and DOES 1-50,
inclusive.

20 Defendants.

Case No. 2:25-cv-04929 JLS (PDx)

Judge: Hon. Josephine L. Staton

**DECLARATION OF P. BRANKO
PEJIC IN SUPPORT OF
DEFENDANT RAINBOW K
JEWELRY SAS' EX PARTE
APPLICATION FOR EXTENSION
OF TIME TO RESPOND TO
COMPLAINT**

[Filed concurrently with Ex Parte Application, Memorandum of Points and Authorities, and (Proposed) Order]

J. P. Branko Pejic, declare as follows:

23 1. I am a partner with the law firm of Greenblum & Bernstein, P.L.C.,
24 counsel to Defendant Rainbow K Jewelry SAS, and I am a member in good standing
25 of the bars of the state of Arkansas and the District of Columbia as well as the U.S.
26 District Court for the Northern District of Oklahoma, U.S. District Court for the
27 District of Columbia, U.S. Court of Appeals for the Federal Circuit and the U.S. Court
28 of Appeals for the D.C. Circuit, and there are no pending disciplinary proceedings

1 against me in any state or federal court. I have never been convicted of a felony, and
2 I have never been censured, suspended, disbarred, or denied admission or readmission
3 by any court.

4 2. I make this declaration based upon my own personal knowledge, and if
5 called upon as a witness, I could and would competently testify to the matters stated
6 herein. I make this declaration in support of Defendant's *Ex Parte* Application for
7 Extension of time for Defendant Rainbow K Jewelry SAS to Respond to the
8 Complaint.

9 3. Rainbow K Jewelry SAS first contacted Greenblum & Bernstein on
10 June 6, 2025 regarding representation in the above captioned action, and provided a
11 copy of the Complaint, which was served at a trade show in Las Vegas, Nevada, on
12 June 4, 2025. After clearing conflicts, we spoke with representatives of Rainbow K
13 Jewelry SAS and were retained on June 9, 2025, and authorized to act by the client
14 on June 11, 2025.

15 4. I reached out to Plaintiff's counsel, Mr. Michael Saltz, via telephone on
16 Friday, June 13, 2025, and left a message with his assistant, (i) advising that
17 Greenblum & Bernstein had just been retained by Rainbow K Jewelry SAS and (ii)
18 requesting the courtesy of stipulating to a 30-day extension to respond to the
19 Complaint to (a) permit us to evaluate Plaintiff's claims (this is time consuming
20 because we are located in the Washington, DC, metro area and the client is located in
21 France) as well as (b) locate and retain local counsel (who would be located in the
22 Pacific time zone). Having received no response from Plaintiff's counsel, we followed
23 up regarding my message via email on the morning of Wednesday, June 18, 2025,
24 reiterating the request for a stipulated extension. (See Ex. 1) While awaiting a
25 response from Mr. Saltz, we retained local counsel, Edith Sanchez Shea, Esq., on
26 June 19, 2025, who reached out to Plaintiff's counsel for the third time in a week on
27 Friday, June 20, 2025. (See Ex. 2).

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1 5. On Monday, June 23, 2025, Simone E. Poyourow, Esq. of Plaintiff's
2 counsel's firm sent an email stating that they did not have the "power to grant an
3 extension" but suggesting that Rainbow K Jewelry SAS "are free to request an
4 extension ex parte with the Court." (See Ex. 3).

5
6 I declare under penalty of perjury under the laws of the United States of
7 America that the foregoing is true and correct.

8 Executed this 24th day of June, 2025, at Reston, VA.

9
10 *P Branko Pejic*
11 _____
12 P. Branko Pejic